

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

United States Securities and Exchange Commission,)	Civil Action
)	0:11-cv-723-ADM-JSM
Plaintiff,)	
v.)	
)	
Marlon Quan, Acorn Capital Group, LLC)	
and Stewardship Investment Advisors, LLC,)	
)	
Defendants,)	
and)	
)	
Asset Based Resource Group, LLC and Florene Quan,)	
)	
)	
Relief Defendants)	
and)	
)	
Nigel Chatterjee, Court-Appointed Liquidator of Stewardship Credit Arbitrage Fund, Ltd., Putnam Green, Ltd., and SCAF I, Ltd.,)	
)	
)	
Intervenor.)	

**MOTION FOR LEAVE TO
DEPOSIT FUNDS WITH THE
COURT AND TO DISMISS ASSET
BASED RESOURCE GROUP, LLC
AS A RELIEF DEFENDANT**

Pursuant to Rules 8(a), 12(b) and 67 of the Federal Rules of Civil Procedure and Rule 67.1 of the Local Rules of the United States District Court for the District of Minnesota and other applicable law, Asset Based Resource Group, LLC (“ABRG”) hereby moves the Court for leave to deposit funds with the Court and to dismiss ABRG as a relief defendant with prejudice. ABRG’s motion is based on the file, records and proceedings herein as well as ABRG’s memorandum of law, including affidavits and attached exhibits, filed herewith.

Dated: December 1, 2011

WINTHROP & WEINSTINE, P.A.

By: /s/Michael A. Rosow

Geoffrey P. Jarpe, #49761

Daniel C. Beck, #192053

Thomas H. Boyd, #0200517

Michael A. Rosow, #317998

225 South Sixth Street, Suite 3500

Minneapolis, Minnesota 55402

(612) 604-6400

gjarpe@winthrop.com

dbeck@winthrop.com

tboyd@winthrop.com

mrosow@winthrop.com

Attorneys for Asset Based Resource Group,
LLC

6455373v1